

MEMO ENDORSED

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January 30, 2025

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VIA ECF AND E-MAIL

Hon. District Judge Valerie Caproni
 United States District Court
 Southern District of New York
 500 Pearl Street, Room 1930
 New York, NY 10007
 CaproniNYSDChambers@nysd.uscourts.gov

Re: ***Trisa Harris v. Langston Retail, LLC, and Amazing City Fashion, Inc***
Civil Action No.: 1:24-cv-07699-VEC

Dear Judge Caproni:

My Firm represents the defendant, Langston Retail, LLC ("Langston") in the above-entitled action brought by Plaintiff Trisa Harris ("Plaintiff").

We write to respectfully request an extension of time to file a joint letter to the court from January 30, 2025 to February 13, 2025. We also respectfully request an adjournment of the Initial Pretrial Conference ("IPTC") from February 7, 2025 to February 21, 2025. This request is made pursuant to Section 2(C) of the Individual Rule of Practice in Civil Cases. This is the first request for an extension of time. Plaintiff has not consented to this request.

By way of brief background, this Court issued a Notice of Initial Pretrial Conference for Cases Filed Under the Americans with Disabilities Act ("Notice") on October 11, 2024. The Notice scheduled this matter for an IPTC on February 7, 2025, at 10:00 a.m. The Notice also required the parties to submit a joint letter addressing the following:

- (1) a brief description of the case, including the factual and legal bases for their claim(s) and defense(s),
- (2) the basis for subject-matter jurisdiction,
- (3) any contemplated motions, and

January 30, 2025

Page 2

(4) the prospect for settlement

My Firm was retained to represent Langston on Tuesday, January 21, 2025. Our office has not had sufficient time to investigate the facts and circumstances surrounding Plaintiff's allegations, and thus, are not in a position to make the factual and legal representations on a joint letter, as required by this Court. We respectfully requests that the Court grant Langston's request for an extension of the deadline to file a joint letter and request for an adjournment of the IPTC.

We thank this Court for its time and attention to this matter.

Respectfully submitted,

WOOD, SMITH, HENNING & BERMAN LLP

By: /s/ Jared K. Levy.
JARED K. LEVY, ESQ.

RMC

36416288.1:10314-0141

Application GRANTED. The Initial Pretrial Conference scheduled for February 7, 2025 at 10:00 A.M. is ADJOURNED to February 21, 2025 at 10:00 A.M. in Courtroom 20C of the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York, 10007. (*Note this is a new courtroom for the Undersigned). The parties' joint letter and proposed case management plan must be filed by no later than February 13, 2025. Defendant's time to respond to the Complaint is STAYED to February 21, 2025.

SO ORDERED.

 1/30/25

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE